

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ROBERT HILLER	:	CIVIL ACTION
PLAINTIFF,	:	
	:	NO. 13-CV-05926
VS.	:	
	:	
ENVIRONMENTAL ENERGY	:	
RECYCLING CORP., GREENWORKS	:	
HOLDINGS, LLC, DAVE DUNHAM,	:	
RALPH TOMMASO	:	
DEFENDANTS.	:	

**AFFIDAVIT AND REQUEST FOR DEFAULT
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 55(a)**

1. On October 8, 2013, a Complaint was filed in the above captioned matter in the United States District Court for the Eastern District of Pennsylvania.
2. Plaintiff served all Defendants with a Summons and the Complaint pursuant to Federal Rule of Civil Procedure 4(d) on February 7, 2014.
3. Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A)(i), Defendants were required to file an Answer or otherwise enter a defense within twenty-one (21) days, on or before February 28, 2014.
4. None of the Defendants filed an Answer or otherwise entered a defense before February 28, 2014.
5. As of May 9, 2014, none of the Defendants have filed an Answer or otherwise entered a defense in this matter.
6. Plaintiff therefore requests that this Clerk of District Court enter default against Defendants pursuant to Federal Rule of Civil Procedure 55(a).

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All of the foregoing statements are verified by me to be true and correct, and are made under penalty of perjury

/s/ George S. Kounoupis

George S. Kounoupis, Esquire
HAHALIS & KOUNOUPIS, P.C.

20 E. Broad Street
Bethlehem, PA 18018

610-865-2608
Attorneys for Plaintiff

Dated: May 9, 2014

CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been served this day via first class mail to:

Environmental Energy Recycling Corp.
591 Male Road
Wind Gap, PA 18091

Greenworks Holdings, LLC
591 Male Road
Wind Gap, PA 18091

Dave Dunham
591 Male Road
Wind Gap, PA 18091

Ralph Tommaso
591 Male Road
Wind Gap, PA 18091

/s/ George S. Kounoupis
George S. Kounoupis, Esquire

Date: May 9, 2014